

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff

v.

ROWLAND MARCUS ANDRADE,

Defendant

CASE No. 3:20-cr-00249-RS-1

**MOTION FOR RECONSIDERATION
OF ORDER DENYING
DEFENDANT'S SECOND MOTION
TO EXTEND SELF-SURRENDER
DATE (ECF 814)**

Judge: Hon. Richard Seeborg

EXHIBIT – B

DECLARATION OF JOHN M. PIERCE

John M. Pierce (Bar No. 250443)
jpierce@johnpiercelaw.com
JOHN PIERCE LAW P.C.
21550 Oxnard Street, 3rd Floor
Woodland Hills, CA 91367
Tel. (321) 961-1848

Attorneys for Defendant
ROWLAND MARCUS ANDRADE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No. 3:20-CR-00249-RS

**DECLARATION OF JOHN PIERCE
ISO DEFENDANT'S MOTION FOR
RECONSIDERATION OF ORDER
DENYING DEFENDANT'S SECOND
MOTION TO EXTEND SELF-
SURRENDER DATE (ECF 814)**

Judge: Hon. Richard Seeborg

DECLARATION OF JOHN M. PIERCE

This declaration incorporates by reference all the facts set forth in the previous declarations filed at docket numbers **788-1,808-2, and 811-1**. I, John M. Pierce, hereby declare as follows:

1. I am counsel of record for Defendant Rowland Marcus Andrade in the above-entitled action and submit this declaration based on personal knowledge obtained through my direct representation of Mr. Andrade, review of relevant case materials, and

1 communications with him and his medical providers. If called as a witness, I could
2 and would testify competently thereto.

- 3 2. On December 29, 2025, I received an email from the Ninth Circuit CJA office
4 indicating that they had approved the expert request. However, they noted that they
5 need confirmation from the Chief Executive Office regarding the expert's hourly rate.
6 Andrade's immediate assistance will be critical for the expert to complete their report,
7 as Counsel does not have the information that the expert requires.
- 9 3. Today, December 31, 2025, I received an email from Mr. Donson regarding phone
10 accessibility within the Bureau of Prisons. Mr. Donson explained that communication
11 with experts is significantly constrained in BOP facilities. Phone calls are generally
12 limited to 15 minutes, after which the inmate must wait approximately one hour before
13 making another call. There is no privacy, as conversations can be overheard by others
14 in the unit, and access is further restricted by the fact that there are typically only four
15 phones available for a unit of approximately 150 inmates.

17
18 I declare under penalty of perjury under the laws of the United States that the foregoing is
19 true and correct. Executed on December 31, 2025.

20
21
22
23 /s/ John M. Pierce
24 /s/ John M. Pierce